

June 29, 2009  
via electronic filing

Ms. Rosa G. Lewis  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Re: SEIU COPE Amended 12 Day Pre-General Report (10/01/08-10/15/08), received 10/31/08

Dear Ms. Lewis:

This is in response to your letter to SEIU COPE, dated May 29, 2009. In your letter, you ask five questions regarding the above referenced Report.

1) Because it does not coincide with a calendar month, the Pre-General report is required to be prepared and submitted before the accounting department can complete its normal monthly bank reconciliation process. Our amended report added two large and unusual receipts ? one for a refund from a vendor and the other an income tax refund -- that were inadvertently omitted from the original report. In addition, even at the time of the amendment (the last day of the calendar month the reporting period occurred in) the bank reconciliation was not complete and a clerical error resulted in reporting the same vendor refund on both Lines 15 and 17. We will be filing another amended report that will eliminate this double-counted receipt.

2) The amended report we will be filing will clarify the expenditures and reportable debts for ?MNP Partners, Inc.? and the corresponding 48hr notices filed.

3) The amended report we will be filing will modify the expenditures described as ?canvass staff and expenses? to clarify that they were payments for ?door-to-door voter ID and get out the vote efforts?. The expenditure described as ?consulting and training? will be clarified to reflect it was for ?staff training for door-to-door voter ID and get out the vote efforts.?

4) The payments to individuals for travel disclosed on Schedule B were not made to any committee staff, but rather were contributions to defray the travel costs of SEIU members or officers who attended the Democratic National Convention as delegates and we believe have been properly reported as operating expenses on Line 21.

5) The expenditure in this report that was described as for ?change the media market for ads,? were not for communications containing express advocacy, but rather was a contractual penalty for not using media time that had been reserved. Expenditures for communications actually distributed were reported on Schedule E in the appropriate period. The expenditures in this report that were described as for,? ?polling research? were not for communications containing express advocacy. They were made for general research and advice on communications and voter attitudes and thus were correctly included on the report Line 21.

Please feel free to contact me if you have any further questions.

Sincerely,

Robert Hauptman

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